

Kathleen A. Mullins
E: Kathleen.mullins@kaufmandolowich.com
D: 212-485-9976

Kaufman Dolowich LLP
40 Exchange Place, 20th Floor
New York, NY 10005
Telephone: 212.485.9600
Facsimile: 212.485.9700
www.kaufmandolowich.com

November 7, 2024

VIA ECF

The Honorable Jennifer E. Willis, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

Re: **JOINT LETTER REGARDING SETTLEMENT CONFERENCE DATES AND
CLASS CERTIFICATION BRIEFING**

Brockmole, et al. v. EZ Festivals LLC, et al.
Avchukov, et al. v. Avant Gardner, LLC, et al.
Palie, et al. v. EZ Festivals LLC, et al.
Ting, et al. v. Avant Gardner LLC, et al.
Case No. 1:23-cv-08106-VM (Consolidated)

Dear Judge Willis:

Our firm represents Defendants EZ Festivals LLC, Avant Gardner LLC, Made Event LLC, Jurgen Bildstein, CityFox, Reynard Productions, and AGDP Holding, Inc. (the “EZ Defendants”) in the above four putative class action lawsuits, and we write jointly with counsel for the Plaintiffs. We write, pursuant to Your Honor’s Order of October 2, 2024 to provide proposed dates for the settlement conference, which was initially scheduled for October 8, 2024 but was adjourned by Your Honor sine die at the EZ Defendants’ request. We also write regarding the deadline for Plaintiffs’ class certification briefing.

The parties have met and conferred and are available on December 3 and 10, 2024 for the settlement conference, and for a pre-conference call with Your Honor one week earlier, *i.e.*, November 26 or December 3, 2024, respectively.

In light of the resetting of the settlement conference date and at Defendants’ consent, the Plaintiffs request that the deadline for filing their opening brief on class certification be extended to thirty (30) days after date of the settlement conference, either January 2, 2025 or January 9, 2025, subject to the Court’s agreement of course (or 30 days after the date of the settlement conference, whenever scheduled, if neither December 3 nor December 10 is available). The Plaintiffs propose this extension because the issue of class certification may be rendered moot or limited depending on the outcome of the settlement conference. Currently, Plaintiffs’ opening brief

is due on November 8, 2024, Defendants' opposition is due December 9, 2024, and Plaintiffs' reply brief is due December 27, 2024. Accordingly, the parties request either of the following briefing schedules depending on which date the settlement conference is set:

Plaintiffs' opening brief:	January 2, 2025
Defendants' opposition:	February 3, 2025
Plaintiffs' reply brief:	February 21, 2025

-OR-

Plaintiffs' opening brief:	January 9, 2025
Defendants' opposition:	February 10, 2025
Plaintiffs' reply brief:	February 28, 2025

Accordingly, we respectfully request that the Court schedule a settlement conference for either December 3, 2024 or December 10, 2024, and grant the Plaintiffs' request for an extension of time to file its opening class certification brief per the above proposed schedules.

Respectfully submitted,

SQUITIERI & FEARON, LLP <u>/s/ Lee Squitieri (With Permission)</u> Lee Squitieri lee@sfcasslaw.com <i>Attorneys for Brockmole Plaintiffs</i>	KAUFMAN DOLOWICH LLP <u>/s/ Kathleen A. Mullins</u> Kathleen A. Mullins kathleen.mullins@kaufmandolowich.com Patrick M. Kennell pkennell@kaufmandolowich.com <i>Attorneys for Defendants</i> EZ FESTIVALS, LLC, AVANT GARDNER, LLC, MADE EVENT LLC, and JURGEN BILDSTEIN
MOORE KEUHN, PLLC <u>/s/ Fletcher Moore (With Permission)</u> Fletcher Moore fmoore@moorekuehn.com <i>Attorneys for Brockmole Plaintiffs</i>	CORBETT RIGHTS, P.C. <u>/s/ Jonathan Corbett (With Permission)</u> Jonathan Corbett jon@corbetrightrights.com <i>Attorneys for Avchukov Plaintiffs</i>
DGW KRAMER, LLP <u>/s/ Jacob Chen (With Permission)</u> Jacob Chen	TRIEF & OLK <u>/s/ Eyal Dror (With Permission)</u> Eyal Dror

Re: *Brockmole, et al. v. EZ Festivals LLC, et al.* (1:23-cv-08106-VM)(Consolidated)

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jchen@dgwllp.com Rita Wang rita@dgwllp.com <i>Attorneys for Ting Plaintiffs</i> PARKER POHL LLP <u>/s/ Shelly L. Friedland (With Permission)</u> Shelly L. Friedland shelly.friedland@parkerpohl.com <i>Attorneys for Palie Plaintiffs</i>	edror@triefandolk.com <i>Attorneys for Palie Plaintiffs</i>
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